

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS
CORPORATION

Plaintiff,

v.

Case No. 2:13-CV-655
(LEAD CASE)

AMERICAN AIRLINES, INC., *et al.*,
Defendants.

**PLAINTIFF LOYALTY CONVERSION SYSTEMS CORPORATION'S
REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Loyalty Conversion Systems Corporation (“Loyalty Conversion” or “Plaintiff”) files this Reply in support of its Motion to preliminarily enjoin Defendants¹ from filing related actions in other courts [Dkt. 91] (“Motion”), and in support thereof states as follows:

Despite Plaintiff filing a single Motion, Defendants collectively filed four responses to Plaintiff’s Motion. *See* Dkt. Nos. 92, 93, 94, 95. Southwest and Hawaiian filed a joint Response to Plaintiff’s Motion [Dkt. 92] (the “Hawaiian/Southwest Response”). In the separate Response filed by Defendants American Airlines, Delta, Frontier, United, and US Airways, those Defendants seemingly incorporate by reference the Hawaiian/Southwest Response rather than including any detailed legal arguments specific to American Airlines, Delta, Frontier, United, and US Airways. *See* Dkt. 93. Accordingly, Plaintiff incorporates herein all legal arguments contained in its Reply to the Hawaiian/Southwest Response, concurrently filed herewith.

Dated: July 17, 2014

Respectfully submitted,

/s/ Andrew G. DiNovo
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¹ Defendants Southwest Airlines, Co. (“Southwest”), JetBlue Airways Corporation (“JetBlue”), Delta Air Lines, Inc. (“Delta”), Frontier Airlines, Inc. (“Frontier”), United Airlines, Inc. (“United”), US Airways, Inc. (“US Airways”), American Airlines, Inc. (“American”), Hawaiian Airlines, Inc. (“Hawaiian”) and Spirit Airlines, Inc. (“Spirit”) (collectively “Defendants”).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 17th day of July, 2014, with a copy of the foregoing document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ Andrew G. DiNovo

Andrew G. DiNovo